

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

THOMAS C. GOLDSTEIN,

Defendant

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CRIMINAL NO. LKG-25-6

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**JOINT STATUS REPORT**

The United States of America respectfully submits this joint status report in response to the Court's Order on January 28, 2025 (ECF No. 16). Defendant has reviewed this joint status report and consents to its filing.

***Status of Discovery***

The parties have had several discussions regarding discovery. On February 4, 2025, the Government filed a consent motion for a protective order to facilitate discovery production. ECF No. 23. The Government is preparing discovery, which will be voluminous.

***Trial, Pretrial Motions, and Motions in Limine***

The parties respectfully request more time to engage in the pretrial process before scheduling trial, and before identifying potential pretrial motions and motions *in limine*. The Defendant is currently working on finalizing the arrangements of his defense counsel in this case. An attorney inquiry hearing has been scheduled for February 12, 2025 before Chief Magistrate Judge Sullivan. ECF No. 15. In addition, the parties need more time for the Government to

produce discovery, for Defendant to review discovery, and for the parties to engage in any plea discussions or prepare for pretrial motions and trial.

***Pending Motions***

On January 31, 2025, the Government filed a consent motion to exclude speedy trial time through March 3, 2025. ECF No. 22. On February 4, 2025, the Government filed a consent motion for a protective order to facilitate discovery production. ECF No. 23. Contemporaneous with this joint status report, the Government is filing a consent motion to continue the initial status conference scheduled for February 6, 2025 and pretrial motions deadline scheduled for February 17, 2025. The parties respectfully request to submit a joint status report by March 3, 2025.

Respectfully submitted,

Erek L. Barron  
United States Attorney  
/s/

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Patrick D. Kibbe  
Assistant United States Attorney  
District of Maryland

Stanley J. Okula, Jr.  
Senior Litigation Counsel  
Department of Justice—Tax Division

Emerson Gordon-Marvin  
Hayter Whitman  
Trial Attorneys  
Department of Justice—Tax Division